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**Via ECF**

The Honorable John G. Koeltl  
United States District Judge  
500 Pearl Street, Room 14A  
New York, NY 10007

Re: *Roche Freedman LLP v. Jason Cyrulnik*, No. 1:21-cv-1746 (S.D.N.Y.)

Dear Judge Koeltl:

We write on behalf of Counterclaim-Defendants Devin Freedman, Edward Normand, and Amos Friedland (the "Individual Counterclaim-Defendants"), pursuant to Rule VI.A.2 of the Court's Individual Practices, to request permission to file portions of the Individual Counterclaim-Defendants' answer under seal.

The Individual Counterclaim-Defendants' answer reproduces the allegations set forth in Cyrulnik's Counterclaims. The Court has previously issued orders sealing certain information contained in those allegations. (Dkt. Nos. 71, 99.) The Individual Counterclaim-Defendants respectfully request that the Court seal that same information once again here, for the reasons stated in Plaintiff Roche Freedman LLP's letter dated February 28, 2022. (Dkt. No. 70.) In addition, the Individual Counterclaim-Defendants respectfully request to seal portions of the 18th Affirmative Defense, which discusses information disclosed in materials that were designated confidential under the Protective Order.

Respectfully submitted,

/s/ Jonathan P. Bach

Jonathan P. Bach

cc: Counsel of Record (via ECF)

APPLICATION GRANTED  
SO ORDERED

  
John G. Koeltl, U.S.D.J.

4/12/23